

On-demand charter operations particularly in aircraft with 9 pax or less are incompatible with a number of the new "Twelve Five" security requirements. Many of these incongruities will damage the industry and negatively impact the public good by reducing or eliminating access to on-demand air charter at small airports. The regulations go beyond that mandated by Congress and should be subjected to public comment and review allowing for consideration by everyone affected. As a minimum, the regulations should be modified to take into account the inherent security of on-demand air charter in aircraft of 9 pax or less that happen to weigh 12,500# or more.